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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF OREGON**
12 **EUGENE DIVISION**

13 KIMBERLY TRENT,

14 Plaintiff,

15 v.

16 LEAH HUFFMAN,

17 Defendant.

CASE NO. 6:17-cv-01906-MC

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS**

18
19 Plaintiff Kimberly Trent and Defendant Leah Huffman submit the following proposed
20 voir dire questions:

21 Many of these proposed questions could elicit answers that indicate further questioning
22 is necessary. If a particular answer does so, Plaintiff respectfully requests the right to ask
23 additional questions and the Court to examine whether there has been a disclosure of possible
24 bias or prejudice.

25 In addition to the Court's General Questions to Jury, the questions Plaintiff would ask
26 the Court to submit to the jurors include the following:

1. Where do you live and with whom?

- 1 2. What do you and your significant other do for work?
- 2 3. Does anyone have strong feelings for or against civil lawsuits?
- 3 4. Does anyone have strong feelings about in personal injury cases in general or
- 4 the amount of damages or caps on damages?
- 5 5. Does anyone have any concerns if the plaintiff only has to prove her damages
- 6 by a preponderance of the evidence?
- 7 6. Has anyone here gone to the Woodburn Mall?
- 8 7. Has anyone here exited southbound from I-5 to go to the Woodburn Mall?
- 9 8. Does anyone believe they have special experience or expertise involving head
- 10 injuries?
- 11 9. Do you have any training or work experience in the field of health care?
- 12 10. Do you or anyone close to you have any experience involving traumatic brain
- 13 injury?
- 14 11. Have you or someone close to you ever suffered a serious injury?
- 15 12. Have you ever testified before in a court of law or been a witness in a lawsuit?

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17 DATED this 13th day of March 2022.

18 **GRUBE OREHOSKI, PLLC**

19 By: /s/ Joseph A. Grube
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